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March 2, 2009

Via ECFS

Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36
Annual 64.2009(e) CPN Certification for 2008
Norstan Communications, Inc. d/b/a Black Box Network Services - Form
499 Filer ID 827433

Dear Ms. Dortch:

Enclosed for filing is the 2008 CPNI Compliance Certification submitted on behalf of Norstan Communications, Inc. d/b/a Black Box Network Services. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 09-9 issued January 7, 2009.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to mbyrnes@tminc.com.

Sincerely,

Monique Byrnes
Consultant to
Norstan Communications, Inc.
d/b/a Black Box Network Services

MB/sp

Attachment

cc: FCC Enforcement Bureau (2 copies)
Best Copy and Printing (via email to FCC@BCPIWEB.COM)
T. Blakemore – Black Box
file: Black Box - CPNI
tms: FCCx0901

Annual 64.2009(e) CPNI Certification for: Calendar Year 2008
Date Filed: March 2, 2009
Name of Company covered by this certification: Norstan Communications, Inc.
d/b/a Black Box Network Services
Form 499 Filer ID: 827433
Name of Signatory: Terry Blakemore
Title of Signatory: CEO and President

I, Terry Blakemore, certify that I am an officer of the company named above, and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification as Attachment A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Terry Blakemore
Norstan Communications, Inc.
d/b/a Black Box Network Services

March 2, 2009
Date

Attachment A
Statement in Support of Certification for Calendar Year 2008

Norstan Communications, Inc. d/b/a Black Box Network Services

The Norstan Communications, Inc. d/b/a Black Box Network Services (hereinafter referred to as the "Company") telecommunications offering is the provision of audio-bridging teleconferencing services throughout the United States.¹ The Company does not actively market its telecommunications services to end-users in any fashion, although the Company's teleconferencing services do have a web presence. The Company has not used or disclosed CPNI for any sales or marketing related purpose or activities and the Company has not permitted any third parties to do so.

The Company does have access to CPNI, including billed call detail. This information resides in the Company's computers, accessible only to employees specified by senior management. The Company does not disclose CPNI via an on-line system. The Company does not have any retail locations and therefore does not disclose CPNI in-store. If it elects to do any of the above, in the future, it will follow all the applicable rules set forth in 47 CFR Subpart U.

The Company services are billed directly by the Company and all customer service inquiries are handled by the Company. Disclosure of call detail information to customers over the telephone is only provided if the caller has the bill and can direct questions to customer service by providing specific call detail about which there are questions and, therefore, falls within the exemption for customer service/billing disputes since the customer would be able to provide all of the call detail information necessary to address the customer issue.

¹ In filing this CPNI certification, the Company nonetheless reserves all rights as to whether its audio-bridge teleconferencing services are offered on a common carrier or non-common carrier basis. *See Request for Review by Intercall, Inc. of Decision of Universal Service Administrator*, Order, 23 FCC Rcd 10731, ¶ 17-18 (2008).

With the exception of such customer service inquiries, the Company does not use CPNI for any purpose for which customer approval is required. Should the Company expand its business in the future to include the provision or marketing of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary: (i) the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed; (ii) the implementation of authentication procedures that do not require the use of readily available biographical or account information; (iii) the notification to customers of account change; (iv) the implementation of a program to inform law enforcement in the event of a breach of customer CPNI; and (v) compliance with all CPNI protection requirements.

Requests for raw call records by law enforcement agencies are only granted if a subpoena is provided.